

Rec'd 2/20/87

UniFirst Corporation
15 Olympia Avenue
P.O. Box 4017
Woburn, Massachusetts 01888
Telephone (617) 933-5800

Site:	<u>Wells G+H</u>
Break:	<u>11.9</u>
Other:	<u>548835</u>

February 19, 1987



SDMS DocID

548835



Ms. Gwen Ruta
HRS-1903
Waste Management Division
U.S. Environmental Protection Agency
J.F.K. Federal Building
Boston, MA 02203

Dear Ms. Ruta:

I am responding to EPA's Request to UniFirst for Information pertaining to the Wells G&H Superfund site in Woburn, Massachusetts. As you can imagine, providing answers that include information about operations and business practices that took place 20 years ago and which involve the activities of personnel who are, in some cases, dead and, in other cases, not available, and to provide accurate and complete responses within 15 days has not been easy. At this time, we are submitting information pertaining to your request that we have been able to assemble since I received your request.

In Question 1 of your Information Request, you asked for documentation pertaining to hydrogeologic investigations and/or environmental assessments conducted at UniFirst's Woburn facility. You specifically asked for documents relating to the activities of Environmental Research and Technology, Inc. (ERT) and Dr. John Cherry. Accordingly, we have enclosed with this response the following documents:

- (1) Copy of Jeffrey Lawson's field book (Jeffrey Lawson is ERT's Senior Program Manager);
- (2) Solinst installation logs for wells UC7 and UC7A;

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- (3) PCA Engineering Inc.'s tank fill-pipe test logs;
- (4) ERT's HNu pore-gas analysis field logs;
- (5) Field sampling notes taken by Jeffrey Lawson at the Woburn facility;
- (6) Well and test pit logs taken in 1986 and 1987;
- (7) Laboratory analyses data sheets;
- (8) Draft environmental assessment prepared by ERAS, Inc.
(the final version was not made available to UniFirst).

These documents constitute all documentation of hydrogeologic investigations and/or environmental assessments that has not already been submitted and which does not constitute attorney-client communications or mental impressions, conclusions and legal theories of UniFirst's specially retained experts and counsel (as to which we are, however, giving you the underlying data not generated by EPA or its contractors) that is presently available to UniFirst management.

In your second question, you have asked UniFirst to identify all leaks, spills or releases of any hazardous substance into the environment which may have occurred during the period of UniFirst's operations at the Woburn facility. As you know, ERT conducted an environmental assessment and investigation in 1983 and 1984 under the consent order in EPA Docket No. 83-1006. ERT's reports on its activities under that order, including the Assessment of Groundwater Contamination Potential at Interstate Uniform Corp., Woburn, Massachusetts, November, 1983; the Summary of Monitoring Program, UniFirst Corp., Woburn, Massachusetts, August, 1984; and the Evaluation and Recommendations for Alternatives Concerning Additional Investigation of Groundwater Contamination, September, 1984, you already have in your possession. Those reports described the only releases of which UniFirst management was then and is now aware.

Recently, UniFirst has undertaken additional field investigations into possible sources of ground or groundwater contamination, as described in the scopes of work submitted to EPA by ERT and our attorneys and in field consultation with Mr. David Delaney. These investigations included a pressure

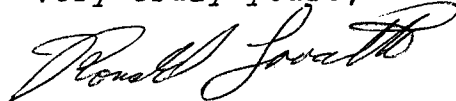
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test of the fill-pipe through which product was fed into and out of an above-ground storage tank that was once within the building. The results reported in Document 4 (listed above in response to Question 1) reveal no detectible leaks. In addition, Jeffrey Lawson tested pore-gas samples with an HNU analyzer at numerous sites on the property. We do not believe that the results of these tests, included in Document 5, as noted above, reveal any release or dumping of hazardous substances or waste. Excavation of a diesel tank in December 1986 also exposed a sewer line that reportedly transported wastewater from the 1966-69 drycleaning operations, and no evidence of leakage was detected. A test pit was dug outside the facility near the fill-pipe that was used to fill the indoor storage tank, and no evidence of releases or dumping was detected there either. Well UC8 was then installed inside the loading dock because there reportedly had once been a storm drain in that vicinity. As we have reported to you, tetrachloroethene was discovered in this well.

The discovery of tetrachlorethene in Well UC8 and EPA's Information Request have caused us to recheck our records and re-interview available past and present employees who were involved in or familiar with operations that involved tetrachloroethene at the facility. To date, however, we have been unable to discover any releases other than those previously reported to EPA or to determine that those releases were the source(s) of the tetrachloroethene found in UC8.

In its third inquiry, EPA has asked UniFirst to submit data on any hazardous substances or waste purchased, generated, stored, treated, disposed of, transported, or otherwise handled at the Woburn facility. All of the data presently available to UniFirst management that are responsive to this request may be found in the documents submitted with this letter and under the 1983 consent order.

Very truly yours,



Ronald Croatti
Vice-Chairman

SVS-3371/U